IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA, *

Plaintiff, *

VS.

*

ERIC NANA KOFI AMPONG COKER, * Case No. 1:22-cr-00317-SAG

Defendant. *

* * * * * * * * * * * *

CONSENT MOTION TO PERMIT TRAVEL

NOW COMES, the Defendant, Eric Nana Kofi Ampong Coker, by and through his attorney, Mark E. Sobel, Esquire and the Law Offices of James E. Crawford, Jr. & Associates, LLC, and says unto this Honorable Court as follows:

- 1. On August 9, 2022, the Defendant appeared for his initial appearance wherein he was released on several pretrial conditions. Specifically, the Defendant was limited to travel in the State of Maryland and to visit his family in Colorado.
- 2. The Defendant recently graduated nursing school from UMBC. The nursing licensing test is scheduled for March 31, 2023, however, it will take place in Alexandria, Virginia (see attached confirmation). The Defendant spoke to his pretrial officer who advised that he needs the Court's permission to travel out of Maryland for the test.
- 3. The Defendant would simply drive to Alexandria the morning of the exam and drive back to Maryland after the exam.
- 4. The Defendant has been fully compliant with the pretrial conditions to date.
- 5. I contacted AUSA Michael Cunningham, Esquire, and he indicated that the government is not opposed to this request.

WHEREFORE, the Defendant respectfully requests that this Court allow him to travel to Alexandria, VA to take the nursing license test on March 31, 2023.

/s/ Mark E. Sobel

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MD AIS/CPF Number: 1506040006

Bar No. 19497

Attorney for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 23, 2023, a copy of the foregoing Consent Motion to Permit Travel was served via CM/ECF on the United States Attorney's Office of the District of Maryland.

/s/ Mark E. Sobel

MARK E. SOBEL, ESQUIRE